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December 11, 2000

Sent via e-mail and either hand-delivery or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Verizon New England, Inc. d/b/a Verizon Massachusetts' Sixth Annual Price Cap Compliance Filing, D.T.E. 00-101

Dear Secretary Cottrell:

Enclosed for filing in the above-referenced matter please find the Attorney General's First Set of Information Requests for Verizon Massachusetts.

If you have any questions please do not hesitate to call.

Sincerely,

Karl en J. Reed

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Wilner Borgella, Jr.
Assistant Attorneys General
Regulated Industries Division
200 Portland Street, 4th Floor
Boston, MA 02114
617-727-2200

WB/wb

Enc.

cc: Tina Chin, Hearing Officer (w/2 enc.)
Attached Service List (w/enc.)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Verizon New England, Inc. d/b/a)
Verizon Massachusetts' Sixth Annual Price Cap) D.T.E. 00-101
Compliance Filing)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated by the Secretary to the Department by e-mail and either hand delivery or U.S. mail.

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Dated at Boston this 11th day of December 2000.

Wilner Borgella, Jr.
Assistant Attorney General
Regulated Industries Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Verizon New England, Inc. d/b/a)
Verizon Massachusetts' Sixth Annual Price Cap) D.T.E. 00-101
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_____)

THE ATTORNEY GENERAL'S

INSTRUCTIONS FOR RESPONDING TO

INFORMATION REQUESTS

1. These Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and

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which is known or available to Verizon New England, Inc., d/b/a Verizon Massachusetts ("Verizon" or "the Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.

2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If an Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be

answered.

9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

10. If, in answering any of these Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which supports the response provided.

15. Please provide one copy of each response.

16. The term "Company" refers to the Company that the data and information requests are directed to. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, agents, and legal counsel.

17. The term "Price Floors Calculations Compliance Filing" refers to Verizon's

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revised price floors calculations which Verizon filed with the Department of Telecommunications and Energy on August 24, 2000, in D.T.E. 94-185-E.

18. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Verizon New England, Inc. d/b/a)

Verizon Massachusetts' Sixth Annual Price Cap) D.T.E. 00-101

Compliance Filing)

)

THE ATTORNEY GENERAL'S

FIRST SET OF INFORMATION REQUESTS

FOR VERIZON MASSACHUSETTS

AG-VZ-1-1 Please refer to Section B, Tab 3, pages 1-4 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). Identify and reference by section and page each and every specific rate element and proposed rate reduction (or rate increase) in the Filing that would be affected specifically by changes in Verizon's price floor calculations.

AG-VZ-1-2 Please refer to Section B, Tab 3, page 2 of the Filing. Identify and reference the specific rate elements and proposed rate reductions whose retail revenues are reflected in Line 1 for Business - MTS Eastern LATA and Residence - MTS Eastern LATA.

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AG-VZ-1-3 Please refer to Section B, Tab 3, page 3 of the Filing. Identify and reference the specific rate elements and proposed rate reductions whose retail revenues are reflected in Line 1 for Baystate Metropolitan and Baystate Non-Metropolitan.

AG-VZ-1-4 Please refer to Section B, Tab 3, page 4 of the Filing. Identify and reference the specific rate elements and proposed rate reductions whose retail revenues are reflected in Line 1 for Business Link.

AG-VZ-1-5 Please refer to Section B, Tab 3, page 2 of the Filing together with page 1 of the Exhibit of the Price Floors Calculations Compliance Filing. Explain the discrepancies in the figures stated in Line 1 through Line 5 and Line 8 through Line 10 for the Business-MTS Eastern LATA and the Residence-MTS Eastern LATA services.

AG-VZ-1-6 Please refer to Section B, Tab 3, page 3 of the Filing together with page 2 of the Exhibit of the Price Floors Calculations Compliance Filing. Explain the discrepancies in Verizon's derivation of the figures stated in Line 1 through Line 5 and Line 8 through Line 10 of the Filing from those in the Price Floors Calculations Compliance Filing for the Baystate Metropolitan and the Baystate Non-Metropolitan services.

AG-VZ-1-7 Please refer to Section B, Tab 3, page 4 of the Filing together with page 3 of the Exhibit of the Price Floors Calculations Compliance Filing. Explain the discrepancies in Verizon's derivation of the figures stated in Line 1 through Line 5 and Line 8 through Line 10 of the Filing from those in the Price Floors Calculations Compliance Filing for the Business Link services.

AG-VZ-1-8 Please refer to the residential switched access rate of 0.038163 and business switched access rate of 0.039575 contained in Section B, Tab 3, pages 2-4 of the Filing. Please explain how Verizon derived these switched access rates and why Verizon did not use the residential switched access rate of 0.038325 and the business switched access rate of 0.040846 stated in Verizon's August 24, 2000, Price Floors Calculations Compliance Filing in D.T.E 94-185-E, Exhibit, page 1 of 3.

AG-VZ-1-9 Please provide copies of the relevant cost studies and workpapers that support the residential switched access rate of 0.038163 (Section B, Tab 3, pages 2 and 3) and the business switched access rate of 0.039575 (Section B, Tab 3, pages 2 and 4) contained in the Filing.

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AG-VZ-10 Please provide an electronic version of Verizon's August 24, 2000, Price Floors Calculations Compliance Filing filed in D.T.E. 94-185-E.